



**SO ORDERED.**

Ona T. Wang  
U.S.M.J.

Oct. 4, 2024

Muriel Goode-Trufant  
Acting Corporation Counsel

**THE CITY OF NEW YORK  
LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**Lauren Howland**  
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October 3, 2024

**VIA ECF**

Hon. Jesse M. Furman  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

*Re: A.M. et al. v. N.Y.C. Dep't of Educ., 24-cv-6721 (JMF)(OTW)*

Dear Judge Furman:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant, the New York City Department of Education ("DOE"), in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs, and expenses for legal work on the administrative hearing and for this action, under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. § 1400, *et seq.*

I write on behalf of the parties pursuant to the Court's September 24, 2024 Order (ECF No. 14) to respectfully request an adjournment of the Initial Pretrial Conference ("IPTC") currently scheduled for October 17, 2024, *sine die*. This is the first request for an adjournment. We note that this is a fees-only claim, without the need for discovery, and liability is not at issue. Therefore we do not believe that an IPTC is necessary at this time.

Indeed, this office has settled all of the many dozens of similar IDEA fees-only cases brought by plaintiffs represented by the Dayan firm in recent years without the need to burden the court with any motion practice or conferences, and the parties are optimistic this matter will take that same course.

Accordingly, the parties respectfully request that the Court adjourn the IPTC currently scheduled for October 17, *sine die*.

Thank you for considering this request.

Respectfully submitted,  
/s/

Lauren Howland, Esq.  
Special Assistant Corporation Counsel

cc: Adam Dayan, Esq. (via ECF)